

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

KATHRYN HYLAND, MELISSA GARCIA,  
ELDON R. GAEDE, JESSICA SAINT-PAUL,  
REBECCA SPITLER-LAWSON, MICHELLE  
MEANS, ELIZABETH KAPLAN, JENNIFER  
GUTH, and MEGAN NOCERINO, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

NAVIENT CORPORATION and NAVIENT  
SOLUTIONS, LLC,

Defendants.

ECF Case

Case No. 18-CV-09031 (DLC)

**NOTICE OF DEFENDANTS' MOTION TO DISMISS  
PLAINTIFFS' CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, dated November 30, 2018, and the Class Action Complaint in this action (ECF No. 1), Defendants Navient Corporation and Navient Solutions, LLC, by their attorneys Covington & Burling LLP, will move this Court, before the Honorable Denise L. Cote, United States District Court Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 18B, New York, New York, as soon as counsel may be heard, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing all causes of action in the Complaint, and for such other and further relief as the Court deems just and proper.

Dated: New York, NY  
November 30, 2018

Respectfully submitted,

COVINGTON & BURLING LLP

By: s/ Andrew A. Ruffino  
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